

1 William J. Flynn, State Bar No. 95371
2 Scott M. De Nardo, State Bar No. 216749
3 Benjamin K. Lunch, State Bar No. 246015
4 NEYHART, ANDERSON, FLYNN & GROSBOLL
5 44 Montgomery Street, Suite 2080
6 San Francisco, CA 94104
7 Tel. (415) 677-9440
8 Fax (415) 677-9445
9 Email: sdenardo@neyhartlaw.com

10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 (San Francisco Division)

13 SOLANO & NAPA COUNTIES
14 ELECTRICAL WORKERS HEALTH &
15 WELFARE TRUST FUND; et al.,

16 Plaintiffs,

17 vs.

18 CAMERON ELECTRIC & LIGHTING
19 DESIGN, a sole proprietorship; ZACHARY
20 ALAN CAMERON, its owner; and,
21 CAMERON ELECTRIC dba CAMERON
22 ELECTRIC & LIGHTING DESIGN,

23 Defendants.

Case No. C-07-4111 VRW

**SUPPLEMENTAL DECLARATION OF
SCOTT M. DE NARDO IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANTS CAMERON
ELECTRIC & LIGHTING DESIGN and
ZACHARY ALAN CAMERON**

[F.R.C.P. Rule 55(a)]

Date:

Time:

Courtroom: 6, 17th Floor

Location: 450 Golden Gate Ave

San Francisco, CA 94102

Judge: Hon. Vaughn R. Walker

DECLARATION OF SCOTT M. DE NARDO

I, Scott M. De Nardo, declare and state:

1. I am an attorney at law, licensed to practice before all of the courts of the State of California and a member of the bar of this Court. I am a partner with the law firm of Neyhart, Anderson, Flynn & Grosboll, attorney for the SOLANO & NAPA COUNTIES ELECTRICAL WORKERS HEALTH & WELFARE TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS LABOR & MANAGEMENT COMMITTEE; I.B.E.W. LOCAL 180 JOINT APPRENTICESHIP TRAINING TRUST FUND; SOLANO AND NAPA COUNTIES ELECTRICAL WORKERS PENSION TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS PROFIT SHARING PLAN; LOCAL 180 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO; and, DAN BROADWATER, as Trustee of the Plaintiff Trusts, Co-chair of the Committee, and Business Manager/Financial Secretary of I.B.E.W. Local 180 (hereinafter collectively referred to as the "Plaintiffs", "Trusts" or "Funds") in the above-captioned action. I make the following declaration based upon my knowledge, except as to those matters which are herein stated on information and belief, and as to those matters, I believe them to be true. If called as a witness, I can and would testify competently thereto.

2. On April 10, 2008, the Honorable U.S. District Court Chief Judge Vaughn R. Walker issued an Order to Show Cause directing the plaintiff to "file a declaration showing attorney time and costs actually incurred, including the experience level of the attorneys who worked on the case, so the court can determine whether the fees requested are reasonable under the principles set forth in In re HPL Technologies, Inc., Securities Litigation, 366 F.Supp.2d 912, 921-922 (N.D. Cal 2005) (Walker, J)."

1 3. On or about February 19, 2008, I inadvertently uploaded Graham v.
2 DaimlerChrysler Corp. (2004) 34 Cal.4th 553 to the U.S. District Court's Electronic Case Filing
3 ("ECF") system instead of the DECLARATION OF SCOTT M. DE NARDO IN SUPPORT OF
4 POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT
5 AGAINST DEFENDANTS CAMERSON ELECTRIC & LIGHTING DESIGN AND ZACHARY
6 ALAN CAMERON ("De Nardo DCN"). It is my understanding that Chief Judge Walker's
7 chambers were nonetheless provided a copy of this document to be "lodged" in accordance with
8 General Order No. 45. Attached to this Supplemental Declaration as Exhibit "A" is a true and
9 correct copy of the De Nardo DCN that was lodged with chambers and served upon the
10 Defendants in this action.
11

12 4. As stated in the De Nardo DCN, attached hereto as Exhibit "A" and incorporated by
13 reference, "[i]n this action, the Plaintiffs seek reimbursement for reasonable attorney's fees and
14 costs." Currently, I bill the Plaintiffs for my services at the rate of \$235.00 per hour plus actual
15 reimbursement for certain out-of-pocket costs. Out-of-pocket costs include technical costs, such
16 as the filing or service fee, as well as non-technical costs, such as photocopies or postage.
17 (Attached hereto as Exhibit "B" are true and correct copies of monthly billing invoices from
18 October 2007 through March 31, 2008 for this matter. Through March 31, 2008, the firm
19 expended 14.40 hours of my time at the rate of \$235.00 per hour resulting in a total of \$3,384.00
20 in fees. My firm also expended \$73.86 in out-of-pocket costs that appear on the invoices and an
21 additional \$350.00 filing fee for this action, which does not appear on an invoice for a total of
22 \$423.86 expended in costs. In addition to the amounts I have already billed Plaintiff for my
23 services related to this matter, I estimate that I spent an additional three (3) hours in research,
24 preparing and drafting this declaration from April 1, 2008 through the date of this Supplemental
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1 Declaration. If the estimate substantially differs from actual time worked, I will advise the court of
2 the actual time billed. Therefore, the total fees and costs sought is \$4,512.86, which included this
3 additional time. As a result, if these amounts are awarded, Plaintiffs will not claim any additional
4 court technical costs. The De Nardo DCN and the Motion for Default Judgment sought fees and
5 costs of \$4,992.32, which is greater than the amount currently sought because Plaintiffs had
6 originally calculated that a hearing would be held on this matter. As the Court is aware, the
7 hearing on the Motion for Default Judgment was vacated, and as a result no attorney time was
8 incurred related thereto, thereby resulting in a reduction in the fees and costs sought.
9

10 5. I am a 2001 graduate of Indiana University – Bloomington School of Law. I have
11 been a partner with the law firm of Neyhart, Anderson, Flynn & Grosboll (“Neyhart, Anderson”)
12 since January 1, 2008. Prior to that time, I was an associate with Neyhart, Anderson from March
13 2002 through December 31, 2008. Upon joining the Neyhart, Anderson firm, I have been the
14 primary attorney responsible for collection actions involving the Employee Retirement Income
15 Security Act of 1974, as amended (“ERISA”). Approximately twenty percent (20%) of my
16 practice consists of ERISA collection actions. I have presented numerous seminars on ERISA
17 collection cases and am a contributing author of *Employee Benefits Law* (2nd Ed.) – 2007
18 *Cumulative Supplement* (2007 BNA Books). The remainder of my practice focuses primarily on
19 complex litigation (approx. 30%), traditional labor law (approx. 30%), employment law (approx.
20 10%) and other ERISA related worked (10%). Even though I became a partner at the law firm of
21 Neyhart, Anderson on January 1, 2008, my billing rate for this case did not increase.
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Dated this 21th day of April, 2008 at San Francisco, California.

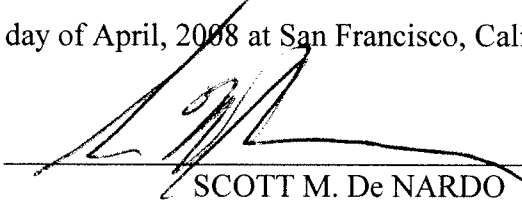
3
4 
5 SCOTT M. De NARDO
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EXHIBIT	A
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116
10180.802

William J. Flynn, State Bar No. 95371
Scott M. De Nardo, State Bar No. 216749
NEYHART, ANDERSON, FLYNN & GROSBOLL
44 Montgomery Street, Suite 2080
San Francisco, CA 94104
Tel. (415) 677-9440
Fax (415) 677-9445
Email: sdenardo@neyhartlaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(San Francisco Division)

SOLANO & NAPA COUNTIES
ELECTRICAL WORKERS HEALTH AND
WELFARE TRUST FUND; et al.,

Plaintiffs,

vs.

CAMERON ELECTRIC & LIGHTING
DESIGN, a sole proprietorship; ZACHARY
ALAN CAMERON, its owner;
CAMERSON ELECTRIC dba CAMERON
ELECTRIC & LIGHTING DESIGN,

Defendants.

Case No. C-07-04111 VRW

**DECLARATION OF SCOTT M. DE
NARDO IN SUPPORT OF POINTS
AND AUTHORITIES IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANTS CAMERON
ELECTRIC & LIGHTING DESIGN
AND ZACHARY ALAN CAMERON**

[F.R.C.P. Rule 55(a)]

Date: April 10, 2008
Time: 2:30 p.m.
Courtroom: 6, 17th Floor
Location: 450 Golden Gate Avenue
San Francisco, CA 94102
Judge: Chief Judge Vaughn R. Walker

DECLARATION OF SCOTT M. DE NARDO

I, Scott M. De Nardo, declare and state:

1. I am an attorney at law, licensed to practice before all of the courts of the State of California and a member of the bar of this Court. I am an attorney with the law firm of Neyhart, Anderson, Flynn & Grosboll, attorney for the SOLANO & NAPA COUNTIES ELECTRICAL WORKERS HEALTH & WELFARE TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS LABOR & MANAGEMENT COMMITTEE; I.B.E.W. LOCAL 180 JOINT APPRENTICESHIP TRAINING TRUST FUND; SOLANO AND NAPA COUNTIES ELECTRICAL WORKERS PENSION TRUST FUND; SOLANO & NAPA COUNTIES ELECTRICAL WORKERS PROFIT SHARING PLAN; LOCAL 180 of the INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO; and, DAN BROADWATER, as Trustee of the Plaintiff Trusts, Co-chair of the Committee, and Business Manager/Financial Secretary of I.B.E.W. Local 180 (hereinafter collectively referred to as the "Plaintiffs", "Trusts" or "Funds") in the above-captioned action. I make the following declaration based upon my knowledge, except as to those matters which are herein stated on information and belief, and as to those matters, I believe them to be true. If called as a witness, I can and would testify competently thereto.

2. In this action, the Plaintiffs seek reimbursement for reasonable attorney's fees and costs. Currently, I bill the Plaintiffs for my services at the rate of \$235.00 per hour plus actual reimbursement for certain out-of-pocket costs. Out-of-pocket costs include technical costs, such as the filing or service fee, as well as non-technical costs, such as photocopies or postage. (Attached hereto as Exhibit "A" are true and correct copies of monthly billing invoices from October 2007 through January 31, 2008 for this matter. Through January 31, 2008, the firm

1 expended 7.7 hours of Mr. De Nardo's time at the rate of \$235.00 per hour resulting in a total of
2 \$1,809.50 in fees. This firm also expended \$12.82 in out-of-pocket costs that appear on the
3 invoices and an additional \$350.00 filing fee for this action, which does not yet appear on an
4 invoice for a total of \$362.82 expended in costs. In addition to the amounts I have already billed
5 Plaintiffs for my services related to this matter, I estimate^{1/} that I will spend an additional twelve
6 hours in research, preparing and arguing this motion. Therefore, the total fees and costs sought is
7 \$4,992.32, which includes this additional time. As a result, if these amounts are awarded,
8 Plaintiffs will not claim any additional court technical costs.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct. Dated this 9th day of February, 2008 at San Francisco, California.

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14 SCOTT M. De NARDO
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27 If the estimate substantially differs from actual time worked, I will advise the court of the
28 actual time billed when the hearing is held.

EXHIBIT

A

NEEHART, ANDERSON, FLYNN & GROSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
SAN FRANCISCO, CALIFORNIA 94104-6702

TEL: (415) 677-9440

FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 12/01/07
 Invoice : 62362
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 12/01/07
 Invoice: 62362

For Professional Services Rendered and Costs Advanced through 11/30/07

Date	Atty	Professional Services	Hours
11/07/07	SMD	Phone call with Mark Lipton RE: CMC and default; review file. Draft notice of declination to proceed before a magistrate judge; e-filed same; draft memo to clerk RE: same; receive and review email to clerk RE: same; Receive and review email from clerk RE; notice of impending reassignment; draft email to Rich Hill RE: audit and status of payments; phone calls (2) with James Capers RE: audit; phone call to Mark Lipton RE: same; phone call with UAS RE: status of transmittals and contributions; receive and review fax from John o'Rourke RE; same.	0.20
11/10/07	SMD	Draft motion for administrative relief RE: CMC and default judgment; efiled same; receive and review email from clerk RE: same; draft email to clerk RE: propose order on CMC; draft memo to Judge Walker RE: same.	1.00
11/15/07	SMD	Receive and review (2) emails from clerk RE: CMC and order; receive and review order from Judge Walker RE: CMC.	0.30

** Continued on next page **

EIN: 94-2576729

THE ABOVE INVOICE INCLUDES ONLY ITEMS ACTUALLY LISTED. OTHER ITEMS OF WORK PERFORMED, OR IN PROCESS, WILL BE INCLUDED IN SUBSEQUENT INVOICES
 PLEASE RETURN ONE COPY OF THE CLIENT SUMMARY PAGES WITH YOUR REMITTANCE

IBEW LOCAL 180
12/01/07
Page 2

Client: 30180.8
Matter: 802
Invoice: 62362

Date	Atty	Professional Services	Hours

TOTAL Hours			1.50
			=====

Attorney	Hours	Rate	Amount
-----	-----	-----	-----
SCOTT DE NARDO	1.50	235.00	352.50
TOTAL Current Fees			\$352.50

Date	Costs Advanced	Amount
11/12/07	COPYING COST	3.00
	POSTAGE	1.64
TOTAL Current Costs		\$4.64
Current Invoice Due		\$357.14
		=====

NEYHART, ANDERSON, FLYNN & GRSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 09/01/07
 Invoice : 61984
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 09/01/07
 Invoice: 61984

For Professional Services Rendered and Costs Advanced through 08/31/07

Date	Atty	Professional Services	Hours
08/01/07	SMD	Receive & review emails (3) from Mark Lipton re: delinquency and lawsuit; draft emails to Mark Lipton re: same.	0.30
08/07/07	SMD	Receive & review email from Mark Lipton re: complaint; draft emails to Mark Lipton re: CBA; receive & review email from Darlene Bestt re: residential agreement; draft Complaint, Civil Cover Sheet, and Summons.	3.00
08/10/07	SMD	Receive and review (6) emails from clerk RE: complaint, summons and scheduling order; receive and review scheduling order.	0.30
08/13/07	SMD	E-filed complaint; draft memo to process server RE: service; receive and review email from clerk RE: e-filing; Phone calls with office RE: process server.	0.40
08/21/07	SMD	Phone call with process server RE: status of service; draft email to Mark Lipton RE: same.	0.20
08/27/07	SMD	Receive and review executed summons on Zachary Alan Cameron and Cameron Electric and lighting; e-filed executed summons (2); receive and review (2) emails from clerk RE: same.	0.30

** Continued on next page **

EIN: 94-2576729

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IBEW LOCAL 180
09/01/07
Page 2

Client: 30180.8
Matter: 802
Invoice: 61984

Date	Atty	Professional Services	Hours
08/30/07	SMD	Receive and review email from Mark Lipton RE: status of payments; draft email to Mark Lipton.	0.20

TOTAL Hours 4.70
=====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	4.70	235.00	1,104.50
TOTAL Current Fees			\$1,104.50

Date	Costs Advanced	Amount
08/13/07	COPYING COST	2.40
TOTAL Current Costs		\$2.40

Current Invoice Due \$1,106.90
=====

NEHART, ANDERSON, FLYNN & GRSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 10/01/07
 Invoice : 62191
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 10/01/07
 Invoice: 62191

For Professional Services Rendered and Costs Advanced through 09/30/07

Date	Atty	Professional Services	Hours
09/12/07	SMD	Review file; draft De Nardo declaration I/S/O default; draft email to Mark Lipton RE: status; draft request for entry of default; efiled request for entry of default; draft memo to clerk RE: same; Receive and review email from clerk RE: same.	1.20
09/28/07	SMD	Receive and review email from clerk RE: default entry; receive and review entry of default; draft emails to Lipton RE: MSJ; receive and review email from Lipton RE: same.	0.30

TOTAL Hours 1.50
 =====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	1.50	235.00	352.50
TOTAL Current Fees			\$352.50

** Continued on next page **

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IBEW LOCAL 180
10/01/07
Page 2

Client: 30180.8
Matter: 802
Invoice: 62191

Date	Costs Advanced	Amount
08/13/07	COPYING COST	2.40
09/12/07	COPYING COST	2.80
	POSTAGE	0.58

	TOTAL Current Costs	\$5.78
	Current Invoice Due	\$358.28
		=====

NEHART, ANDERSON, FLYNN & GROSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
SAN FRANCISCO, CALIFORNIA 94104-6702

TEL: (415) 677-9440

FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 01/04/08
 Invoice : 62626
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 01/04/08
 Invoice: 62626

Date	Atty	Professional Services	Hours
12/03/07	SMD	Receive and review email from Mark Lipton RE: status and lawsuit. (no charge)	0.20

TOTAL Hours 0.20

=====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	0.20	N/C	No Charge

TOTAL Current Fees \$0.00

Current Invoice Due \$0.00

=====

EIN: 94-2576729

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PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On February 19, 2008, I served the within:

**DECLARATION OF SCOTT M. DE NARDO IN SUPPORT OF POINTS AND
AUTHORITIES IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANTS CAMERON ELECTRIC & LIGHTING DESIGN AND ZACHARY
ALAN CAMERON**

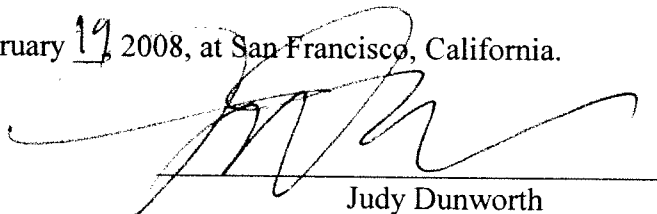
on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

CAMERON ELECTRIC & LIGHTING DESIGN
2412 3rd Street
Napa, CA 94559

ZACHARY ALAN CAMERON
2412 3rd Street
Napa, CA 94559

CAMERON ELECTRIC dba CAMERON ELECTRIC & LIGHTING DESIGN
2412 3rd Street
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on February 19, 2008, at San Francisco, California.


Judy Dunworth

EXHIBIT

B

NEBHART, ANDERSON, FLYNN & GROSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 12/01/07
 Invoice : 62362
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 12/01/07
 Invoice: 62362

For Professional Services Rendered and Costs Advanced through 11/30/07

Date	Atty	Professional Services	Hours
11/07/07	SMD	Phone call with Mark Lipton RE: CMC and default; review file. Draft notice of declination to proceed before a magistrate judge; e-filed same; draft memo to clerk RE: same; receive and review email to clerk RE: same; Receive and review email from clerk RE; notice of impending reassignment; draft email to Rich Hill RE: audit and status of payments; phone calls (2) with James Capers RE: audit; phone call to Mark Lipton RE: same; phone call with UAS RE: status of transmittals and contributions; receive and review fax from John o'Rourke RE; same.	0.20
11/10/07	SMD	Draft motion for administrative relief RE: CMC and default judgment; efiled same; receive and review email from clerk RE: same; draft email to clerk RE: propose order on CMC; draft memo to Judge Walker RE: same.	1.00
11/15/07	SMD	Receive and review (2) emails from clerk RE: CMC and order; receive and review order from Judge Walker RE: CMC.	0.30

** Continued on next page **

EIN: 94-2576729

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 PLEASE RETURN ONE COPY OF THE CLIENT SUMMARY PAGES WITH YOUR REMITTANCE

Client: 30180.8
Matter: 802
Invoice: 62362

Date	Atty	Professional Services	Hours
		TOTAL Hours	1.50
			=====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	1.50	235.00	352.50
	TOTAL Current Fees		\$352.50

Date	Costs Advanced	Amount
11/12/07	COPYING COST	3.00
	POSTAGE	1.64

	TOTAL Current Costs	\$4.64

Current Invoice Due	\$357.14
	=====

NEYHART, ANDERSON, FLYNN & GRSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 09/01/07
 Invoice : 61984
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 09/01/07
 Invoice: 61984

For Professional Services Rendered and Costs Advanced through 08/31/07

Date	Atty	Professional Services	Hours
08/01/07	SMD	Receive & review emails (3) from Mark Lipton re: delinquency and lawsuit; draft emails to Mark Lipton re: same.	0.30
08/07/07	SMD	Receive & review email from Mark Lipton re: complaint; draft emails to Mark Lipton re: CBA; receive & review email from Darlene Bestt re: residential agreement; draft Complaint, Civil Cover Sheet, and Summons.	3.00
08/10/07	SMD	Receive and review (6) emails from clerk RE: complaint, summons and scheduling order; receive and review scheduling order.	0.30
08/13/07	SMD	E-filed complaint; draft memo to process server RE: service; receive and review email from clerk RE: e-filing; Phone calls with office RE: process server.	0.40
08/21/07	SMD	Phone call with process server RE: status of service; draft email to Mark Lipton RE: same.	0.20
08/27/07	SMD	Receive and review executed summons on Zachary Alan Cameron and Cameron Electric and lighting; e-filed executed summons (2); receive and review (2) emails from clerk RE: same.	0.30

** Continued on next page **

EIN: 94-2576729

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 PLEASE RETURN ONE COPY OF THE CLIENT SUMMARY PAGES WITH YOUR REMITTANCE

IBEW LOCAL 180
 09/01/07
 Page 2

Client: 30180.8
 Matter: 802
 Invoice: 61984

Date	Atty	Professional Services	Hours
08/30/07	SMD	Receive and review email from Mark Lipton RE: status of payments; draft email to Mark Lipton.	0.20
TOTAL Hours			4.70

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	4.70	235.00	1,104.50
TOTAL Current Fees			\$1,104.50

Date	Costs Advanced	Amount
08/13/07	COPYING COST	2.40
TOTAL Current Costs		\$2.40
Current Invoice Due		\$1,106.90

NEBHART, ANDERSON, FLYNN & GROSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
SAN FRANCISCO, CALIFORNIA 94104-6702

TEL: (415) 677-9440

FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 10/01/07
 Invoice : 62191
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 10/01/07
 Invoice: 62191

For Professional Services Rendered and Costs Advanced through 09/30/07

Date	Atty	Professional Services	Hours
09/12/07	SMD	Review file; draft De Nardo declaration I/S/O default; draft email to Mark Lipton RE: status; draft request for entry of default; efiled request for entry of default; draft memo to clerk RE: same; Receive and review email from clerk RE: same.	1.20
09/28/07	SMD	Receive and review email from clerk RE: default entry; receive and review entry of default; draft emails to Lipton RE: MSJ; receive and review email from Lipton RE: same.	0.30

TOTAL Hours 1.50
 =====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	1.50	235.00	352.50
TOTAL Current Fees			\$352.50

** Continued on next page **

EIN: 94-2576729

THE ABOVE INVOICE INCLUDES ONLY ITEMS ACTUALLY LISTED. OTHER ITEMS OF WORK PERFORMED, OR IN PROCESS, WILL BE INCLUDED IN SUBSEQUENT INVOICES
 PLEASE RETURN ONE COPY OF THE CLIENT SUMMARY PAGES WITH YOUR REMITTANCE

IBEW LOCAL 180
10/01/07
Page 2

Client: 30180.8
Matter: 802
Invoice: 62191

Date	Costs Advanced	Amount
08/13/07	COPYING COST	2.40
09/12/07	COPYING COST	2.80
	POSTAGE	0.58

	TOTAL Current Costs	\$5.78
	Current Invoice Due	\$358.28
		=====

NEHART, ANDERSON, FLYNN & GROSBOLL
 A PROFESSIONAL CORPORATION
 ATTORNEYS AT LAW
 44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 01/04/08
 Invoice : 62626
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 01/04/08
 Invoice: 62626

Date	Atty	Professional Services	Hours
12/03/07	SMD	Receive and review email from Mark Lipton RE: status and lawsuit. (no charge)	0.20

TOTAL Hours 0.20
 =====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	0.20	N/C	No Charge
TOTAL Current Fees			\$0.00

Current Invoice Due \$0.00
 =====

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 A PROFESSIONAL CORPORATION
 ATTORNEYS AT LAW
 44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

IBEW Local 180 Pension Trust Funds
 1380 Lead Hill Blvd., #106
 Roseville, CA 95661

Attention: Mark Lipton

Client Summary

Invoice Date: 03/03/08

For Professional Services Rendered

CAMERON ELECTRIC

1,527.50

TOTAL Current Fees \$1,527.50

For Costs Advanced

CAMERON ELECTRIC

61.04

TOTAL Current Costs \$61.04

TOTAL Current Due \$1,588.54

Previous Due for All Cases \$164.50

TOTAL Due for All Cases \$1,753.04

A G I N G F O R A L L C A S E S

.....CurrentOver 30Over 60Over 90Over 120	...Total Due
1,753.04					1,753.04

EIN: 94-2576729

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NEYHART, ANDERSON, FLYNN & GRSBOLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
 SAN FRANCISCO, CALIFORNIA 94104-6702
 TEL: (415) 677-9440
 FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 03/03/08
 Invoice : 62913
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 03/03/08
 Invoice: 62913

For Professional Services Rendered and Costs Advanced through 02/29/08

Date	Atty	Professional Services	Hours
02/13/08	SMD	Review file and complaint; revise and edit Lipton declaration I/S/O default judgment; draft notice of default judgment; draft proposed order RE: default judgment; draft De Nardo declaration I/S/O default judgment; draft memo of points and authorities I/S/O default judgment; draft (4) emails to Mark Lipton RE; same; phone call with Mark Lipton RE: default judgment; draft request for miscellaneous relief; receive and review email from clerk RE: CMC; receive and review order RE: CMC.	5.50
02/19/08	SMD	Draft memo to Judge Walker RE: default judgment motion; e-filed pleadings RE: default; judgment motion; receive and review (6) emails from clerk RE: same; draft emails (2) to judge Walker RE: proposed orders.	0.70
02/20/08	SMD	Receive and review order granting administrative relief; receive and review email from clerk RE: same.	0.30

** Continued on next page **

EIN: 94-2576729

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IBEW LOCAL 180
03/03/08
Page 2

Client: 30180.8
Matter: 802
Invoice: 62913

Date	Atty	Professional Services	Hours
-----	-----	-----	-----

		TOTAL Hours	6.50
			=====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	6.50	235.00	1,527.50
TOTAL Current Fees			\$1,527.50

Date	Costs Advanced	Amount
02/19/08	COPYING COST	52.00
02/19/08	COPYING COST	0.40
	POSTAGE	8.64

	TOTAL Current Costs	\$61.04
	Current Invoice Due	\$1,588.54
		=====

NEYHART, ANDERSON, FLYNN & GRSBOLL
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
44 MONTGOMERY STREET, SUITE 2080
SAN FRANCISCO, CALIFORNIA 94104-6702
TEL: (415) 677-9440
FAX: (415) 677-9445

IBEW Local 180 Pension Trust Funds
1380 Lead Hill Blvd., #106
Roseville, CA 95661

Attention: Mark Lipton

Client Summary

Invoice Date: 04/01/08

For Professional Services Rendered

CAMERON ELECTRIC

47.00

TOTAL Current Fees \$47.00

TOTAL Current Due \$47.00

Previous Due for All Cases \$1,588.54

TOTAL Due for All Cases \$1,635.54
=====

A G I N G F O R A L L C A S E S

.....CurrentOver 30Over 60Over 90Over 120	...Total Due
1,635.54					1,635.54

EIN: 94-2576729

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NEYHART, ANDERSON, FLYNN & GROSROLL

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

44 MONTGOMERY STREET, SUITE 2080
SAN FRANCISCO, CALIFORNIA 94104-6702

TEL: (415) 677-9440

FAX: (415) 677-9445

Client : 30180.8
 Matter : 802
 Date : 04/01/08
 Invoice : 63040
 Attorney: SCOTT DE NARDO

IBEW LOCAL 180
 CAMERON ELECTRIC
 2412 3RD STREET
 NAPA CA 94559

IBEW Local 180 Pension Trust Funds
 Re: CAMERON ELECTRIC

Date: 04/01/08
 Invoice: 63040

For Professional Services Rendered through 03/31/08

Date	Atty	Professional Services	Hours
03/19/08	SMD	Review online docket and order granting administrative relief; review file RE: same.	0.20

TOTAL Hours 0.20
 =====

Attorney	Hours	Rate	Amount
SCOTT DE NARDO	0.20	235.00	47.00
TOTAL Current Fees			\$47.00

Current Invoice Due \$47.00
 =====

EIN: 94-2576729

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PROOF OF SERVICE BY MAIL

I, the undersigned, declare:

I am employed in the City and County of San Francisco, State of California. I am over the age of 18 years and not a party to the within action; my business address is 44 Montgomery Street, Suite 2080, San Francisco, California 94104. On April 21, 2008, I served the within:

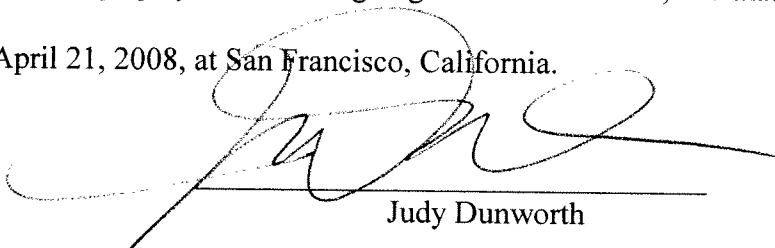
**SUPPLEMENTAL DECLARATION OF SCOTT M. DE NARDO IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS CAMERON
ELECTRIC & LIGHTING DESIGN and ZACHARY ALAN CAMERON**

on the parties in said cause following our business practice, with which I am readily familiar. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid. I placed a true copy of the within document enclosed in a sealed envelope with first class postage thereon fully prepaid for collection and deposit on the date shown below in the United States mail at San Francisco, California addressed as follows:

ZACHARY ALAN CAMERON
2412 3rd Street
Napa, CA 94559

CAMERON ELECTRIC & LIGHTING DESIGN
2412 3rd Street
Napa, CA 94559

I declare under the penalty of perjury that the foregoing is true and correct, and that this declaration was executed on April 21, 2008, at San Francisco, California.



Judy Dunworth